



November 24, 2017

Daniel Shewchuk  
Acting Chairperson,  
Nunavut Wildlife Management Board  
P.O. Box 1379  
Iqaluit, NU  
X0A 0H0



Dear Mr. Shewchuk:

**Re: Nunavut Wildlife Management Board (NWMB) in-person public hearing to consider potential modifications of the Western Hudson Bay (WH) polar bear total allowable harvest (TAH)**

Nunavut Tunngavik Incorporated (NTI) appreciates the opportunity to provide comments on the NWMB's decision concerning the TAH for the Western Hudson Bay (WH) polar bear population.

**A. General Comments**

- 1) NTI supports the decision to increase the TAH for the WH population for the 2017-18 harvest season by 6 (resulting in an overall regional TAH of 34). This modification considered the knowledge, insight and perspectives of Inuit, who have been advocating for an increase on the grounds of both conservation and public safety.
- 2) NTI appreciates the NWMB's efforts to settle the increase of the regional TAH for the WH polar bear subpopulation in a timely manner that safeguards the 2017-18 harvesting season from dispute and uncertainty. While NTI acknowledges the timing, logistical and financial challenges associated with in-person hearings, it must nonetheless be pointed out that Inuit harvesters will only be provided an opportunity to discuss future modifications of the WH regional TAH in a public hearing setting; the initial scope of the public hearing was the consideration of a TAH modification proposal that included the upcoming harvest. NTI urges the NWMB not to forego public hearings in relation to decisions that it views as unlikely to be controversial—such an assumption might not hold true in all instances.

## B. Specific Comments

### *Inuit Qaujimagatuqangit* and Local Knowledge

One of the key objectives of Article 5 of the *Nunavut Agreement* prescribes the creation of a wildlife management system that promotes public confidence, particularly amongst Inuit. NTI strongly encourages inclusion of Inuit knowledge and principles (*Inuit Qaujimagatuqangit*) in wildlife management decision-making to avoid drastic decisions that deteriorate public confidence. For this to occur requires maintaining relationships and communication among different parties that result in improved understanding of the ways in which different sources of knowledge can contribute to decision-making affecting wildlife management.

In previous NWMB hearings, NTI, the KWB, and Arviat HTO have submitted IQ on Western Hudson Bay. In summary, Inuit hunters and elders observed very few polar bears in the earlier part of the 20<sup>th</sup> century. Beginning in the 1980s, Inuit started to notice an increase in numbers of polar bears in the area.

Initially, quotas imposed on Inuit and subsequently co-management with inclusion of Inuit have permitted the WH polar bear population to increase. Consequently, Inuit have repeatedly stated that the number of bears have increased and public safety is now a major concern. A GN analysis of coastal surveys conducted by the Government of Manitoba reveals that the numbers of adult male polar bears counted along the WH coast from 2011 – 2016 have increased, providing support to Inuit observations. The number of adult females with offspring counted along the coast has remained similar for the same period.

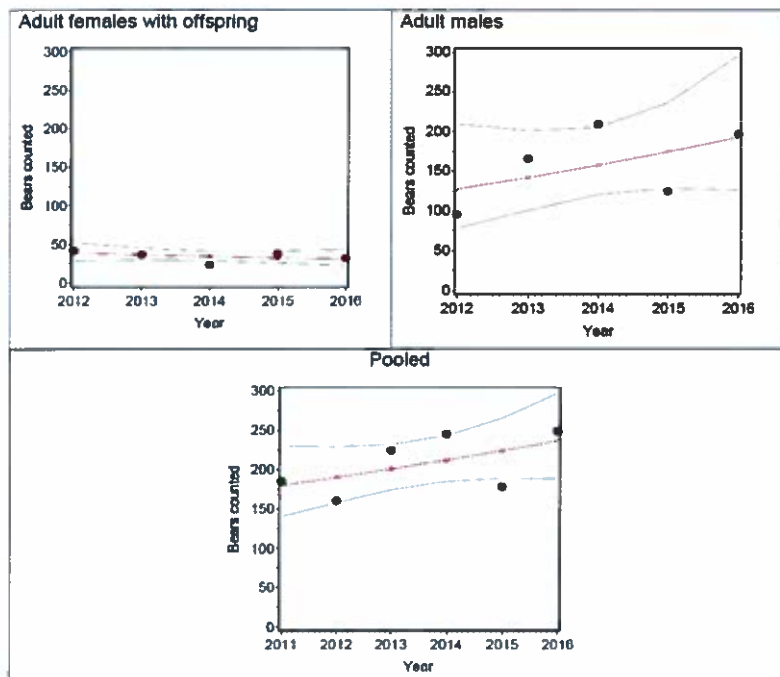


Figure SM2.2: Predicted trend from log-linear models of coastal survey. Counts are given as black dots with model predictions as red lines with associated confidence limits.

## Management Objectives

Under Part 1 of Article 5, subsection 5.1.2 (e), the Nunavut Agreement specifies the need for an effective wildlife management system in Nunavut that “*complements Inuit harvesting rights and priorities, and recognizes Inuit systems of wildlife management*”.

However, over the last decade, Inuit of the Kivalliq region have been subject to significant and at times very drastic fluctuations in the TAH of polar bears from the WH subpopulation. Since 2000-01, annual TAHs have averaged 34 but have ranged from a high of 56 (between 2004-05 and 2006-07) to a low of 8 (between 2008-09 and 2010-11), varying by as much as 30 from one year to the next (Figure 1). For example, the second step of a 2007 NWMB decision involved “a drastic 86% reduction from the current TAH of 56” (NWMB 2007). Scientific evidence generated from computer simulations that suggested the population would continue to decline because of low polar bear vital rates contributed to the NWMB decision (NWMB 2007).

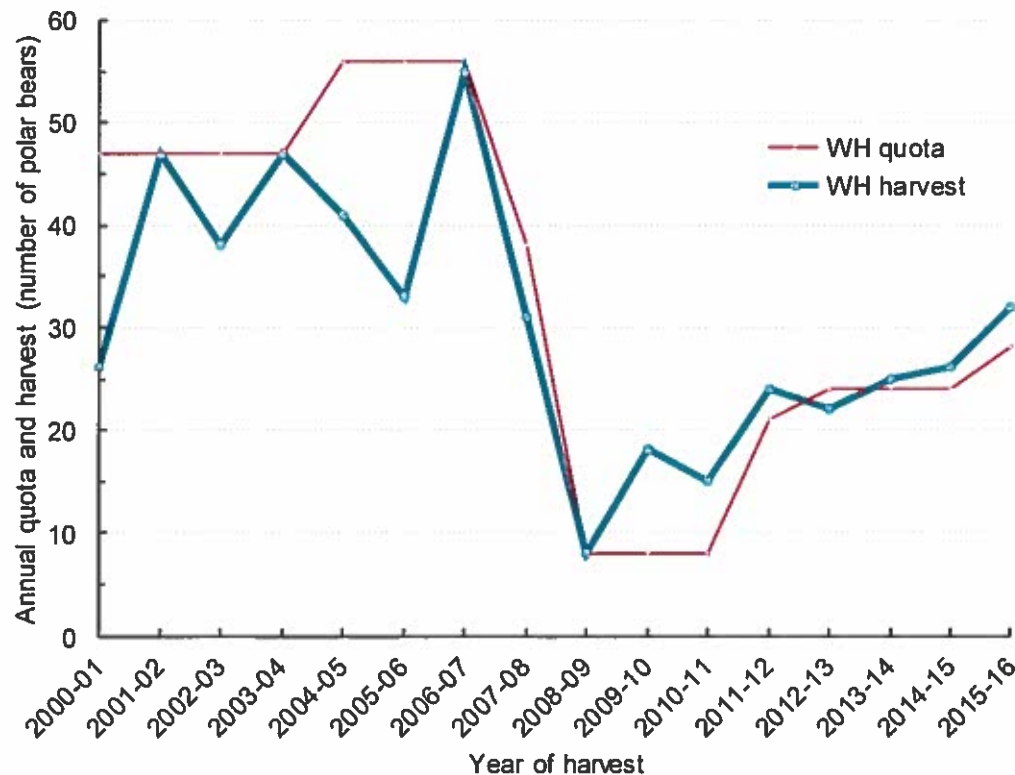
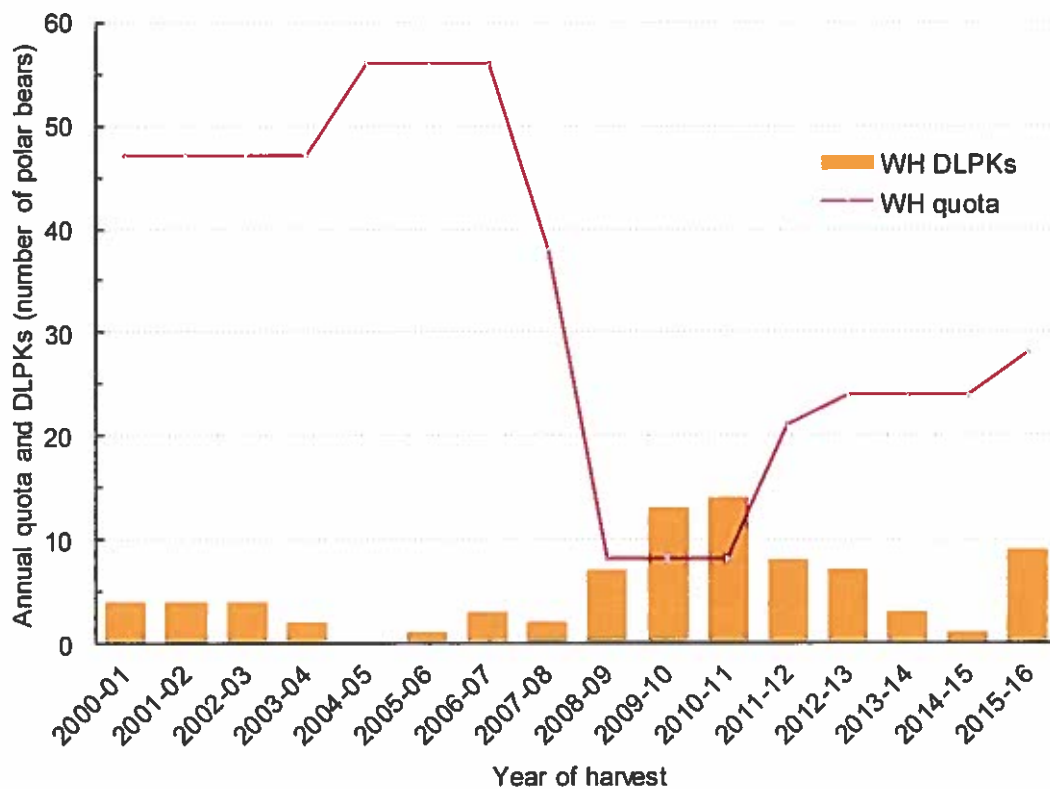


Figure 1. Total annual quotas for the Western Hudson Bay (WH) polar bear subpopulation and combined annual harvests of WH polar bears by Kivalliq communities, from 2000-2001 to 2015-2016. (Source: Adapted from annual Polar Bear Harvest Reports available at <http://www.gov.nu.ca/environnement/information/wildlife-research-reports>)

NTI submits that the NWMB may wish to ponder whether moving away from the flexible quota system and its associated credits and penalties to a multi-year fixed TAH could permit improved relations, communication and discussion amongst parties on developing shared management objectives. To reiterate NTI's May 24, 2017 comments to NWMB on the Nunavut Polar Bear Co-Management Plan revision, the management and application of the flexible quota system has been an ongoing concern to NTI and Inuit harvesters.

With respect to public safety, the TAH continues to exert a certain influence on the number of Defense of Life and Property Kills (DLPKs). Indeed, whereas the combined annual DLPKs of WH polar bears by Kivalliq communities averaged only 3 polar bears between 2000-01 and 2007-0 that average jumped to 8 from 2008-09 to 2015-16 (figure 2). Given the extent of the public safety concern, modification of the TAH represents a sensible course of action.



**Figure 2.** Total annual quotas for the Western Hudson Bay (WH) polar bear subpopulation and combined annual Defense of Life and Property Kills (DLPKs) of WH polar bears by Kivalliq communities, from 2000-2001 to 2015-2016. (Source: Adapted from annual Polar Bear Harvest Reports available at <http://www.gov.nu.ca/environnement/information/wildlife-research-reports>)

Under Part 3, subsections 5.3.3 (a) and (c) of the Nunavut Agreement identify conservation and public safety as acceptable grounds for the restriction of Inuit harvesting. Public safety and the protection of property, as well as the perpetuation of harvesting practices that facilitate the transmission and promotion of *Inuit Qaujimagatuqangit*, remain priorities that should be considered in the management of the population.

Sincerely,



Paul Irmgaut  
Director of Wildlife & Environment  
Nunavut Tunngavik Inc.  
Iqaluit, NU

### References:

NWMB. 2007 Letter to GN re: Western Hudson Bay Polar Bear TAH Decision











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NWMB. 2007 ᑎᑎᑦᑕᑦᑕᑦᑕᑦᑕ GN-ᑕᑦᑕᑦᑕ ᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕ ᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕ ᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕ TAH ᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕᑦᑕ